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Plaintiff pro se
4

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA

7 JOHN LASZLOFFY;

8 Plaintiffs,

9 vs.

10 CINDY ZORAIDA GARCIA,
11 LEONSYMANSKI, ANLV CAB LLC dba
12 as ANLV CAB
And DOES 1 TO 20, Inclusive,

13 Defendants,
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Case No. 2:19-CV-01173-JAD-BNW

JOINT DISCOVERY PLAN AND
SCHEDULING ORDER

SUBMITTED IN COMPLIANCE WITH
LR 26-1(B)

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Plaintiff John Laszloffy, *pro se*, Defendants Cindy Zoraida Garcia and Leon Symanski, by and through their counsel of record Craig P. Kenny & Associates, and Defendant A NLV Cab LLC, by and through its counsel Spencer Fane LLP, hereby submit this Joint Discovery Plan and Scheduling Order pursuant to Fed. R. Civ. P. 26(a) and LR 26-1.

As provided by Local Rule 26-1, the Parties met on September 5, 2023, for the purpose of conferring about the above-entitled action. Specifically, John Laszloffy as *pro se* for Plaintiff, Lawrence Mittin, Esq., attended as counsel for Defendants Cindy Zoraida Garcia and Leon Symanski, and Jessica Chong, Esq., and John Mowbray, Esq., attended as counsel for A NLV CAB LLC.

It is hereby requested that the court enter the following discovery plan and scheduling order:

I. DISCOVERY PLAN

1. Discovery Cut-off Date: March 4, 2024, which is 181 days from the September 5, 2023, meet and confer between the parties.

2. Deadline to Amend Pleadings and/or Add Parties: December 5, 2023, which is 90 days prior to the close of discovery.

3. Deadline for Initial Expert Disclosures: January 4, 2024, which is 60 days prior to the close of discovery.

4. Deadline for Rebuttal Expert Disclosures: February 2, 2024, which is 31 days prior to the close of discovery.

5. Deadline to File Dispositive Motions: April 3, 2024, which is 30 days after the close of discovery.

II. PRETRIAL ORDER

In accordance with Local Rule 26-l(b)(5), the Parties shall file a Joint Pretrial Order no later than Friday May 3, 2024, which is 30 days after the date set for the filing of dispositive motions. In the event that the Parties file dispositive motions, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision on the dispositive motions or

1 further order of the Court. The disclosure required by Federal Rule of Civil Procedure 26(a)(3)
 2 and objections thereto shall be made in the Joint Pretrial Order.

3 **III. INITIAL DISCLOSURES**

4 No changes shall be made to the form or requirement of disclosures under Fed. R. Civ. P.
 5 26(a)(1)(A). The Parties shall exchange initial disclosures required by Fed. R. Civ. P. 26(a)(1)(c)
 6 on or before September 19, 2023.

7 **IV. EXTENSION TO DISCOVERY PLAN**

8 Requests to extend discovery shall comply fully with Local Rule 26-4. Applications to
 9 extend any date set by the discovery plan, scheduling order, or other order, must, in addition to
 10 satisfying the requirements of LR IA 6-1, be supported by a showing of good cause for extension.
 11 All motions or stipulations to extend a deadline set forth in the discovery plan shall be received
 12 by the Court no later than twenty-one (21) days before the expiration of the subject deadline. A
 13 request made after the expiration of the subject deadline shall not be granted unless the movant
 14 demonstrates that the failure to file the motion before the deadline expired was the result of
 15 excusable neglect. The motion or stipulation shall include:

- 16 1. A statement specifying the discovery completed by the parties as of the date of the
- 17 motion or stipulation;
- 18 2. A specific description of the discovery which remains to be completed;
- 19 3. The reasons why such remaining discovery was not completed within the time
- 20 limit of the existing discovery deadline; and
- 21 4. A proposed schedule for the completion of all remaining discovery.

22 It is not good cause for a later request to extend discovery that the parties informally
 23 postponed. Any stipulation that would interfere with any time set for the completion of discovery,
 24 for a hearing of a motion or for trial, may be made only with approval of the Court.

25 **V. LR 26-1 CERTIFICATIONS**

26 The Parties certify that they considered consenting to trial by magistrate judge under 28
 27 U.S.C. §636(c) and Fed. R. Civ. P. 73 and the use of the Short Trial program. The Parties further
 28 certify they met and conferred about the possibility of using alternative dispute resolution. The

Parties agree that no alternative dispute resolution should be ordered at this time.

VI. ELECTRONIC SERVICE

The parties agree to electronic service of discovery.

VII. PROTECTIVE ORDER

The parties agree to meet and confer regarding the submission of a stipulation and proposed protective order governing the handling of confidential information and, upon stipulation, the Parties will submit a proposed protective order to the Court for approval. If any party refused to enter into such a stipulation, the other parties reserve the right to move the Court for an order governing the handling of such confidential information.

DATED: September 8, 2023.

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SPENCER FANE LLP

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IT IS SO ORDERED.

DATED: 9/12/2023


UNITED STATES MAGISTRATE JUDGE